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June 8, 2021

BY ECF

Hon. Mary Kay Vyskocil
United States District Court Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

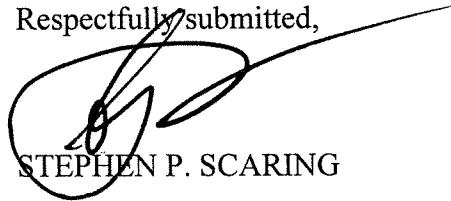
Re: United States v. Navarro, et al.
20-CR-00160

Dear Judge Vyskocil:

We represent Dr. Kristian Rhein, one of the defendants in this case. The defendant's bail conditions restrict his travel to the Eastern, Southern and Western District of New York. We are requesting the opportunity for the defendant to travel to Connecticut. His daughter is scheduled to participate in the Ivy Girl's Lacrosse Tournament at Yale University which is located in New Haven, Connecticut. The tournament is scheduled for Sunday, June 27, 2021. They will be driving to Connecticut early that morning and returning that evening. The defendant's daughters are very active in their lacrosse program, and the defendant would like to show his support.

Both the Government and Pre-Trial Services have been notified, and they have no objection. I would appreciate Your Honor's consideration in allowing this temporary modification of his travel restrictions to allow his attendance at the tournament for that day.

Respectfully submitted,


STEPHEN P. SCARING

cc: AUSA Andrew Adams (by email and ECF)
Pre-Trial Services Officer Marnie Gerardino (by email)
SPS/cn